

**United States
Department of
Agriculture**

**Forest
Service**

**Coconino National
Forest**

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Flagstaff, AZ 86004
(928)-527-3600
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File Code: 1920

Date: September 6, 2001

Dear Friends,

We have signed the Decision Notice to create seven new communication sites that make up a system that will provide continuous wireless service along Interstate 17 between Orme Road and Flagstaff, Arizona. This system is located on both the Coconino and Prescott National Forests. The Coconino Forest Plan is amended to add six of these sites to the list of electronic sites (Amendment # 16). The Prescott Forest Plan is amended to add the remaining site (Amendment # 12). This communication system will increase the safety of people traveling Interstate 17.

Enclosed you will find 5 documents: Decision Notice, Digest, Coconino Forest Plan replacement page, Prescott Forest Plan replacement page, and Appendix E for the EA. There is a single Decision Notice signed by both Forest Supervisors. The Digest (the page which lists the superseded pages and a brief synopsis of changes) that explains the essence of the Amendment and the replacement page for the Coconino Forest Plan. On the Coconino Electronic Site Chart (Appendix C – Forest Plan) there have been some additional updates made beyond adding the six sites described in this EA. All changes to Appendix C are in bold type and further explained in the attached Digest. There is a replacement page for the Prescott Forest Plan. Lastly, Appendix E for the Environmental Assessment describes the Forest Service response to comments received on the EA.

I would like to take this opportunity to thank all of you who participated in this process.

Sincerely,

/s/ Jim Golden
JIM GOLDEN
Coconino Forest Supervisor

/s/ Michael J. King
MICHAEL R. KING
Prescott Forest Supervisor

Enclosures [5]

DECISION NOTICE
and
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
INTERSTATE 17 CORRIDOR (I-17)
WIRELESS COMMUNICATIONS SYSTEM
COCONINO FOREST PLAN AMENDMENT #16
PRESCOTT FOREST PLAN AMENDMENT # 12

Coconino and Prescott National Forests
Coconino and Yavapai Counties, Arizona

I. DECISION

We, (Coconino and Prescott National Forest Supervisors) have approved the Wireless Communications System as described in the Environmental Assessment (EA) for development of the Interstate 17 Corridor. This decision will authorize construction of six new communications sites on the Coconino National Forest, and one on the Prescott National Forest, including the associated utility corridors necessary to provide electricity to the facilities. The new facilities make up a system that will provide wireless telephone service to the I-17 corridor between Orme Road and Flagstaff, Arizona. This decision amends the Forest Land Management Plans (Forest Plans) by the designation of seven new communications sites. .

The new communication sites will each consist of a land allocation of approximately 0.5 acres in size, on which will be located a tower(s) and equipment building(s) in accordance with the I-17 Corridor Wireless Communications Site Plan and EA. Tower height at each site varies, however in all cases will not exceed 200 feet. Carrier antennae position for each tower is designated in the EA. The position or vertical separation of each carriers' antennae may vary from the designated position depending upon the selected radiation frequency mitigation plan. The decision includes adoption of all recommended mitigation identified in the EA, Chapter 3.1 Affected Environment and Environmental Consequences of the System. An additional mitigation measure is needed to minimize the visual impacts that could result from individual carriers developing their own microwave systems that connect the wireless system to the wire line phone system. As many as 14 microwave dishes may be necessary on a single tower, if each carrier had to make their own linkage from the wireless system to the wire line phone system (seven carriers each with a dish for sending and receiving). However, we are requiring that the wireless system be based on shared microwave system, therefore reducing the number of dishes on each tower. In addition site-specific mitigation for each site and identification of selected tower alternatives are as follows:

1. **Onion Mountain** – All recommended mitigation in the EA, Chapter 3.2.1.2 will be required as part of the terms and conditions of the communication site lease.
2. **Rarick Canyon** (McGuireville Rest Stop) – Alternative B is selected with identification of 4 light poles and adding permission for microwave dishes in lieu of wire line phone connection. Alternative B stipulates replacement of the two existing light poles with four light poles up to 160 feet in height. Lighting for illumination of the rest area will be

attached to the new poles and will be placed at a lower height than the existing lighting configuration. All recommended mitigation in the EA, Chapter 3.2.2 is required with the exception of requiring wire line telephone connections and not allowing microwave dishes. Microwave dishes are acceptable as long as they are painted a flat dark color and do not exceed three feet in diameter if positioned on the tower. Larger microwave dishes may be acceptable if they are ground mounted or attached to rest stop or communications equipment buildings.. However, underground wire line phone connection is preferred and proposals that include it will be favorably rated in the prospectus process.

3. **Rocky Park** – All recommended mitigation in the EA, Chapter 3.2.3 is required with the exception of one modification to the requirement of underground utilities. Underground utilities are required where the utility corridor crosses I-17 to minimize impacts to scenery. The Forest Service landscape architect will identify on the ground the beginning and end points of the underground utilities for inclusion in the prospectus. The remaining portions of the utility corridor can be overhead because existing tree cover provides adequate screening as viewed from I-17. Underground utilities within the Rattlesnake Quiet Area are preferred. Proposals from applicants in response to the prospectus that include underground utilities within the Rattlesnake Quiet Area and elsewhere along the utility corridor will be favorably rated.
4. **Woods Canyon** – Alternative A, one 180-foot tall self-supporting tower is selected. All recommended mitigation in the EA, Chapter 3.2.3 is required with the exception of one modification to the requirement of underground utilities. Underground utilities are required where the utility corridor crosses I-17 to minimize impacts to scenery. The Forest Service landscape architect will identify on the ground the beginning and end points of the underground utilities for inclusion in the prospectus. The remaining portions of the utility corridor can be overhead because existing tree cover provides adequate screening as viewed from I-17. Underground utilities are preferred and recommended for the utility corridor. Proposals that include underground utilities will be favorably rated for determining award of the communication site lease.
5. **Douglas Mountain** – Recommended mitigation in the EA, Chapter 3.2.5.6 is required.
6. **Ritter Mountain** – Alternative A, one 195-foot tall self-supporting tower is selected. Recommended mitigation in the EA, Chapter 3.2.6.6 is required.
7. **James Canyon** – Recommended mitigation in the EA, Chapter 3.2.7.6 is required.

Following this decision and subsequent Forest Plan Amendments, a prospectus will be issued to solicit applications from interested and qualified parties for communication site leases that will authorize construction, operation, and management of the system. The proposals will be awarded after responses to the prospectus are evaluated for environmental compatibility, fee to the government, reasonableness of fees charged to tenants, and technical merit.

II. RATIONALE FOR DECISION

Our decision to implement this wireless system is based on (1) it is consistent with Forest Service policy, regulation, and national direction; (2) meets Forest Service design objectives for environmental compatibility; and (3) there is a public desire to improve wireless communications to improve public safety and enhance the quality of life.

I-17 is a major north/south transportation corridor for Arizona that travels through the Coconino and Prescott National Forests. Currently, there are many areas along the I-17 corridor where there are breaks in wireless telephone coverage. The traveling public has become accustomed to and now relies on having wireless communications on transportation corridors. The lack of wireless communications reduces response time by emergency service providers and contributes to other safety and security problems. The construction of a wireless communications system along I-17 will enhance the safety of the traveling public and provide the convenience of reliable wireless communications. Currently there are towers in place on private land located at Kachina Village, the Verde Valley, Cordes Junction, and Orme Road that will be used in addition to the proposed new tower sites on National Forest lands completing the wireless communications system for the I-17 corridor between Orme Road and Flagstaff, Arizona.

A major factor in our decision to implement was that in an unprecedented effort, the wireless industry formed a coalition that included all of the licensed carriers and collaboratively designed a wireless system that meets industry's technical needs through co-location. This effort substantially reduced the number of towers and associated environmental effects. In addition, the PA fulfilled the Forest Services objectives for the proposal. Those objectives were as follows:

- Facilitate co-location of all carriers.
- Meet the technical needs of all licensed carriers.
- Minimize the number of new sites to reduce environmental impacts.
- Avoid FAA lighting requirements for towers by limiting height to 200 feet.
- Locate new tower sites to minimize visual impacts.
- Address wireless industry communication site needs for the next five to ten years.

Using the Forest Service design objectives, Industry identified eight potential sites for new towers to complete a system that would provide continuous coverage on I-17 between Orme Road and Flagstaff. A qualified landscape architect then conducted a visual assessment of the proposed tower locations. A complex analysis including hovering a helicopter at each site was used to determine the visibility of a tower on the landscape and the amount of time it would be visible to the driving public. The visual assessment resulted in several modifications of the original proposal to address visual concerns. Several tower sites were relocated to reduce visibility. Re-positioning of the towers also reduced the number of towers to seven. In addition, environmental investigations were conducted for each proposed site in order to avoid environmentally sensitive areas. The result of this effort was the PA. The Proposed Action was modified several times to accommodate the technical requirements of various carriers and to mitigate environmental concerns.

The proposed wireless system meets the purpose and need while minimizing visual and environmental impacts.

In areas where the predominant landowner is the federal government, the general public relies on that public land to provide for societal needs like right-of-ways for power, communications, and transportation. Wireless communications is a relatively new and expanding technology that the general public is now demanding. There are seven different carriers of wireless telephone

services licensed by the Federal Communications Commission (FCC) for northern Arizona. The licensed carriers include cellular (analog), PCS (digital), and enhanced specialized mobile radio service (ESMR) wireless services. A condition of the carrier's FCC license mandates that they provide full coverage of the licensed areas by a certain date. In order to provide this coverage, new communication sites on National Forest land must be developed. The President of the United States and Congress have made it clear to federal agencies that implementation of a wireless communication system is important to the nation and should be facilitated. On August 10, 1995, President Clinton signed an Executive Memorandum to Federal Agencies that stated "Upon request, and to the extent possible by law and where practical, executive departments and agencies shall make available Federal Government buildings and lands for the siting of mobile service antennas". On February 8, 1996, Congress followed by passing the Telecommunications Act of 1996 which gave further direction to federal agencies to make federal lands and facilities available to facilitate implementation of wireless communication services.

III. PUBLIC INVOLVEMENT AND SCOPING

In April 10, 2000, a project proposal letter, which described the proposed action, was mailed out to the Prescott and Coconino National Forest Plan mailing lists of interested parties (see Chapter 5), which described the PA. The mailing list totaled 1,204 addresses that included individuals, organizations, and government agencies. In addition, a press release was issued at the same time and an article appeared in the Arizona Daily Sun on April 24, 2000 that described the proposal. We received a total of 35 responses. The comments received during this scoping process were used to verify our analysis strategy and methods (Chapter 2.1.1 EA). There were some comments that lead us to alternative designs for some locations. On April 13, 2001, the Environmental Assessment was released and mailed to 117 addresses that included individuals, organizations, Indian Tribes, Government agencies, and other parties that commented on the project proposal or indicated they would like a copy of the EA. Eleven comments were received as a result of the EA mailing. Those comments in opposition to the proposal were general in nature and did not identify specific issues regarding environmental effects associated with the tower sites. Appendix E for the EA details those comments and the Forest Service response, which is included as an attachment to this mailing.

IV. ALTERNATIVES CONSIDERED

In response to comments received during the scoping process and to verify the methodology for designing the system, the Forest Service directed the wireless industry to analyze alternatives for system design. The following are discussions on alternatives for system design that were considered but dropped from detailed consideration:

Tower Heights Greater Than 200 Feet:

When industry first approached the Forest Service, they proposed to have only five new sites on Forest Service land along I-17. The sites would have required towers 250 to 300 feet in height in order to provide adequate signal coverage. At that height, the towers would require lighting and would be very massive to the eye. A reduction in tower height to a maximum of 200 feet eliminates the need for lighting required by the Federal Aviation Administration (FAA). Tower

heights that exceed 200 feet and are lighted at night significantly increases the potential for avian mortality due to collisions with towers. The United States Fish and Wildlife Service recommends restricting tower heights to less than 200 feet. Due to the need for lighting, which increases visual impacts and potential avian mortality, this alternative was dropped from further consideration.

Limit Tower Height to 110-feet:

Limiting tower heights to a maximum of 110-feet, consistent with City of Flagstaff ordinances, was also reviewed. This was dropped from further analysis because the number of towers would dramatically increase. With a 110-foot tower height limitation, a second tower would have to be constructed at each site so that all of the carrier's antennas would clear the forest canopy. One tower could not accommodate all carriers because antennas must have adequate separation to avoid signal interference with each other. In addition, at least six additional sites would have to be constructed with two towers each, increasing the number of towers from the proposed seven to twenty-six. Each of these new sites would require the same 100' x 200' ground space, as well as power and ground access. Therefore, due to potential increase in impacts resulting from providing access and utilities to additional sites and the proliferation of towers, this alternative was dropped from detailed consideration.

Solar Power

Solar Power was analyzed for use at the proposed sites as an alternative to overhead or underground electric power lines. This alternative was dropped from further analysis due to the amount of land that would be needed to accommodate the solar panels necessary to provide sufficient electric power to operate the communications equipment. In order to supply adequate solar power, the land allocated for the communication site would have to be increased from 0.5 acres to an average of 1.0 acre. However, adjacent land would have to be cleared of trees to avoid shading during the day. Solar panels would also contribute to additional adverse visual effects. Current solar power technology with batteries does not supply the consistent reliable electrical power that is required for telecommunications use.

Median Pole Placement

An alternative of placing the towers in the median of I-17 was reviewed. Arizona Department of Transportation (ADOT) will not allow this option because I-17 is a controlled access highway. ADOT's policy to not allow access is based on safety issues related to vehicles entering and leaving the freeway at areas not designed to accommodate access. Additionally, in some areas this would increase the pole numbers by a factor of ten, requiring approximately 70 sites. Therefore, this alternative was dropped from detailed analysis.

Light Poles

The Forest Service asked Industry to examine the feasibility of using a series of 50-foot light poles along the ADOT right-of-way for I-17 as an alternative to a single site at Onion Mountain. The Onion Mountain site is designed to serve I-17 from private land sites in Camp Verde to

existing private land sites near Orme Road. This area of I-17 has geologic features that prevent long line-of-sight connections between telecommunications facilities. In addition, the roadway has been carved through several hills that create a “canyon” effect that would require sites at both ends of the “canyon”. With these existing limitations, it is estimated that the number of sites required to serve this area would be at least 15 for this approximate 15-mile length of highway. In addition, electrical power would be needed. There are generally about 20 power poles per mile needed to supply electrical power to these sites; consequently the total number of new poles would be approximately 300. This alternative was dropped from further consideration due to the increased environmental and economical impacts of providing access and utilities to 15 more sites.

In addition to the system design alternatives, several tower site alternatives for the Onion Mountain site were considered and eliminated from further study because the Onion Mountain Site had less visual impacts.

V. FINDING OF NO SIGNIFICANT IMPACT

Our decision to implement the Wireless Communications System on I-17 does not have a significant effect on the environment. Environmental effects analysis is documented in Chapter 3 of the EA.

Context. This project is a site-specific action that by itself does not have significant international, national, region-wide or statewide importance. The discussion of significance criteria that follows applies to the intended action and is within the context of local importance in the area associated with the I-17 corridor.

Intensity. The following discussion is organized around the Ten Significance Criteria described in the National Environmental Policy Act (NEPA) regulations (40 CFR 1508.27).

1. The analysis considered both beneficial and adverse effects. Chapter 3 of the EA contains a complete discussion of effects. Through proper design of the facilities and operational controls, adverse effects can be adequately mitigated.
2. There are no known adverse impacts to public safety. The intended action will not adversely affect public health and safety. The purpose of the action is to improve emergency communications for the general public.
3. No unique characteristics of the geography, such as cultural resources and wetlands, will be adversely affected. A cultural resources survey and clearance have been completed, and all cultural resources will be avoided and protected. There are no wetlands impacted by the communications facilities.
4. The effects on the quality of the human environment are not likely to be highly controversial. The effects of the project are limited to the I-17 corridor between Orme Road and Flagstaff. While some people have disagreed with our decision to implement a wireless system, no person has provided evidence that environmental effects have been

wrongly predicted. The EA, Chapter 2.1.1 describes the comments received on the PA.

5. The degree of possible effects on the human environment are not highly uncertain, nor are there unique or unknown risks involved. Effects are discussed in Chapter 3 of the EA and there are none that have a high degree of uncertainty or unknown risks.
6. Site-specific actions found as part of this decision do not set a precedent for future action, which may have significant effects, nor does this represent a decision in principle about a future consideration. A decision to establish new communication sites along the I-17 corridor does not establish any future precedent for other actions that may have a significant effect. These sites have been identified as a complete wireless communications system.
7. These actions are not related to other actions that, when combined, will have significant impacts. Cumulative effects are documented in Chapter 3 of the EA. There is not a significant cumulative effect to the environment, or to the economy of the Flagstaff region or the Nation..
8. This decision will not contribute to the loss or destruction of significant scientific, cultural, or historic resources. There are no known unique scientific characteristics within the project area. A cultural resources survey and clearance was completed, all cultural or historic resources will be avoided and protected. (EA page 22)
9. This decision will not adversely affect any threatened or endangered species of plants or animals or habitat critical for the management of these species. Chapter 3 of the EA describes threatened or endangered species in the I-17 corridor. There are no adverse affects to threatened or endangered species nor is any critical habitat designated for this area. (See the Project Record for the BA&E)
10. This decision does not violate or threaten to violate Federal, State, or local laws, or requirements imposed for the protection of the environment. The Decision complies with relevant laws, including but not limited to the following; the Clean Air Act as amended; Protection of Wetlands Executive Order 119990; Safe Drinking Water Act; National Historic Preservation Act as amended; Archaeological Resources Protection Act of 1979; Native American Religious Act; National Forest Management Act; Migratory Bird Act; National Environmental Policy Act; and Telecommunications Act. The decision also complies with Arizona State Laws regarding natural resource protection, including but not limited to water quality, as well as County resource protection measures.

We find that implementing the I-17 Corridor Wireless Communications System does not constitute a major Federal action that would significantly affect the quality of the human environment in either context or intensity. We have made this determination after considering both positive and negative effects, as well as direct, indirect, and cumulative effects of this action and foreseeable future actions.

We have found that the context of the environment impacts of this decision is limited to the local

area and is not significant. We have also determined that the severity of these impacts is not significant.

VI. EFFECTIVE DATE AND IMPLEMENTATION

This project will not be implemented sooner than five business days following the close of the appeal filing period established in the Notice of Decision in the *Arizona Daily Sun* and in the *Daily Courier*. If an appeal is filed, implementation will not begin sooner than 15 calendar days following a final decision on the appeal. Although the policies will take effect at the conclusion of the appeal period, we expect that there will be a lapse of approximately three months during which prospectus will be advertised and awarded to then be followed by actual on-the-ground implementation.

VII. ADMINISTRATIVE REVIEW

The decision to issue a communication site lease or leases and to make a non-significant Forest Plan Amendment is subject to administrative review pursuant to 36 CFR 215. A written notice of appeal under 36 CFR 215 must be filed with the Regional Forester within 45 days of the date that a notice of this decision is published in the *Arizona Daily Sun* for the Coconino and in the *Daily Courier* for the Prescott National Forest. A notice of appeal must be fully consistent with the requirements found in 36 CFR 215. At a minimum, a written notice of appeal must include the following:

- State that your appeal is filed pursuant to 36 CFR 215 or 251.
- Provide your name, address and telephone number.
- Identify this Decision Notice by its title.
- Identify the decision or decisions you wish reviewed.
- State the reasons for your objections, including issues of fact, laws, regulation, or policy, and if applicable, specifically state how the decision violates law, regulation, or policy.
- Identify the specific change or changes in the decision that you seek.

A notice of appeals may include a request for stay to keep the decision from being implemented. A request for stay should provide the following information:

- A description of the specific actions to be stopped by the stay.
- Specific reasons why the stay should be granted. This should contain sufficient detail to permit the Reviewing Officer to evaluate and rule upon the stay request. At a minimum you should discuss the specific adverse effects of implementation upon you; harmful site-specific impacts or effect on resources in the area affected by the activity or activities to be stopped; and how the cited effects and impacts would prevent a meaningful decision on the merits of the appeal.

Appeals must be filed with the Regional Forester, Southwestern Region, 333 Broadway SE, Albuquerque, New Mexico 87102; Attention: Appeals Contact Person.

*Decision Notice - I-17 Corridor Wireless Communications System –
Coconino Forest Plan Amendment #16
Prescott Forest Plan Amendment # 12*

For further information, contact Ken Jacobs at the Mormon Lake Ranger Station, 4343 South Lake Mary Road, Flagstaff, AZ 86001; telephone 928-214-2464; E-mail: kajacobs@fs.fed.us.

/s/ Jim Golden_____ Date: _9/6/2001_
JIM GOLDEN
Forest Supervisor
Coconino National Forest

/s/ Michael R. King_____ Date: _9/6/2001_
MICHAEL R. KING
Forest Supervisor
Prescott National Forest

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COCONINO NATIONAL FOREST PLAN
DIGEST
FOREST PLAN AMENDMENT #16

July 2001

Forest Plan amendments are numbered consecutively. Check the last transmittal to see if this amendment is in sequence. If it is not please contact the Supervisor's Office, Land management Planning to obtain the missing amendment.

Page Number	Superseded	New (Number of Sheets)
235	1	1
236	None	1

Digest:

235 Updates the table to reflect current operations.

236 Adds six new electronic sites to the Forest Plan list. These sites are designed for low power wireless communications along the Interstate 17 Corridor. Updates information for other existing electronic sites to reflect current types of use, authorized uses, whether new permits are accepted, and whether expansion within the electronic site is permitted.

Adds three single user government facilities: House Mountain, Ike's Backbone, and Oak Creek Vista covered in a separate environmental analysis.

/s/ Jim Golden
JIM GOLDEN
Forest Supervisor

APPENDIX C

ELECTRONIC SITES

Site Name	Acres	Ranger District	Current Types of Use	Authorized Uses	New Permits Accepted	Expansion Permitted
Apache Maid Lookout	2	Beaver Creek	2-Way	Gov't. Agencies	No	No
O'Leary Lookout	2	Elden	2-Way, radio	FS, Gov't. Agencies	Yes	No
Devil's Head	10	Elden	2-Way, Microwave, CMRS	Open – Low Power	Yes	Yes
Mt. Elden	3	Elden	2-Way, TV, Microwave, CMRS	Open – Low Power	Yes	No
TV Ridge	10	Elden	2-Way, Microwave, CMRS	Open – Low Power	Yes	Yes
Woody Mtn. Lookout	0.5	Flagstaff	2-Way	FS	No	No
East Pocket	0.5	Flagstaff	2-Way	FS	No	No
Saddle Mountain	0.5	Flagstaff	2-Way, CMRS	Gov't Agencies, CMRS	Yes	Yes
Turkey Butte	0.5	Flagstaff	2-Way	FS	No	No
A-1 Mountain	1	Flagstaff	Microwave	Open - Low Power	Yes	Yes
Agassiz (top of ski lift)	0.25	Flagstaff	2-Way	Ski Area use only	No	No
Baker Butte	3	Long Valley	2-Way	FS	No	No
Buck Mountain	3	Long Valley	2-Way	FS	No	No
Hutch Mountain	10	Long Valley	2-Way, Microwave	FS	No	No
Five Mile	10	Long Valley	2-Way, Microwave, Radio	Open	Yes	Yes
Mormon Mountain	10	Mormon Lake	Commercial Broadcast, 2-Way, TV, Microwave, CMRS	Open	Yes	Yes
Mormon Lookout	0.5	Mormon Lake	2-Way	FS	No	No
Lee Butte	0.5	Mormon Lake	2-Way	FS	No	No

Site Name	Acres	Ranger District	Current Types of Use	Authorized Uses	New Permits Accepted	Expansion Permitted
Schnebley Hill	5	Mormon Lake	Commercial Broadcast, 2-Way, Microwave, CMRS	2-Way, CMRS, Low Power	Yes	Yes
Sedona Airport Beacon	0.01	Sedona	Radar- Avigational Aid Station	Federal Agencies	No	No
Moqui Lookout	5	Blue Ridge	2-Way	FS	No	No
Snow Bowl Wireless Low Power Site	0.1	Peaks	CMRS	CMRS, Gov't. Agencies, 2-way	Yes	No
House Mountain	1.0	Sedona	2 way	Gov't. agencies, fire dept.	No	No
Ike's Backbone	1.0	Beaver Creek	2 way	Gov't. agencies, APS	No	No
Oak Creek Vista	0.5	Sedona	2 way	Gov't. Agencies, fire dept.	No	No
Rarick Canyon Wireless	0.5	Beaver Creek	None (new 2001)	CMRS, Gov't. Agencies	Yes	No
Rocky Park Wireless	0.5	Mormon Lake	None (new 2001)	CMRS, Gov't. Agencies	Yes	No
Woods Canyon Wireless	0.5	Mormon Lake	None (new 2001)	CMRS, Gov't. Agencies	Yes	No
Douglas Mountain Wireless	0.5	Mormon Lake	None (new 2001)	CMRS, Gov't. Agencies	Yes	No
Ritter Mountain Wireless	0.5	Mormon Lake	None (new 2001)	CMRS, Gov't. Agencies	Yes	No
James Canyon Wireless	0.5	Mormon Lake	None (new 2001)	CMRS, Gov't. Agencies	Yes	No

- **CMRS – FCC definition of Commercial Mobile Radio Service.**
- This list includes electronic sites that are part of the Forest Service communications network, such as lookouts. Refer to the Forest-wide Standards and Guidelines under the Special Uses component for potential restrictions concerning the non-Forest Service use of the sites.

- J01 Utility corridors may be authorized after an EIS and/or Plan revision (first) on unclassified areas and, (second) on avoidance areas. A corridor plan will be prepared during the second decade to consider future needs.
- J01 Requests for utility corridors will be coordinated to locate needed facilities within existing corridors where feasible. Design and construction practices will meet the standards defined in National Forest Landscape Management Volume 2. Chapter 2. U.S.D.A. Handbook 478.
- J01 Require Rural Electrification Administration (REA) specifications for raptor protection and permitted power lines during construction and reconstruction.
- J01, A14 Require burial of new utility lines in all foreground areas of retention or partial retention VQO areas along State and Federal highways, unless an environmental analysis indicates that it would be unfeasible.
- J01, A07 Requests for authorization to construct or reconstruct any structure or facility must be accompanied by three sets of professionally prepared plans or three sets of plans which reflect professional standards.
- J01, A07 New construction and reconstruction must meet or exceed all applicable codes.
- J01 Efforts will be made to consolidate new electronic site proposals on currently approved sites. Recommendations to the Regional Forester on undesignated electronic site classifications will be made after a comprehensive environmental analysis indicates such occupancy will not compromise other National Forest Management objectives.
- J01 Continue to maintain the following electronic sites for public, private, and other agency use:
- | | |
|--------------------------|---------------------------|
| 1. Hickey Mountain | 11. Spruce Mountain |
| 2. Mingus Mountain | 12. Mount Davis |
| 3. South Mingus Mountain | 13. Mount Elliott |
| 4. Towers Mountain | 14. Mount Union |
| 5. Horsethief | 15. Mount Tritle |
| 6. Sierra Prieta | 16. Squaw Peak |
| 7. Tonto Mountain | 17. Hyde Mountain |
| 8. Alto Divide | 18. Wildflower |
| 9. Mount Francis | 19. Onion Mountain |
| 10. Wolverton Mountain | |
- J01 Use will be limited to these sites except in cases where national defense and/or public safety may be adversely affected.

ENVIRONMENTAL ASSESSMENT - APPENDIX E

RESPONSE TO COMMENTS

INTERSTATE 17 WIRELESS COMMUNICATIONS SYSTEM

PROPOSAL

ORME ROAD TO FLAGSTAFF

The following is a summary of the public comments received and the Forest Service response to those comments resulting from distribution and public review of the Environmental Assessment dated April 2, 2001.

***Comment #1.** Andria L. Odean 4/10/01: Concerned about destruction of Arizona scenery and wildlife. Fears that the use will tear up the land through more roads, heavy trucks, and more repairs.*

Response: Throughout the development of the proposal, Industry was directed to minimize visual and environmental impacts, resulting in several modifications to their original proposal as described in Section 2.1- *Summary of Alternative Development*. All locations contain site-specific mitigation measures that were developed after careful consideration of visual quality, wildlife, roads, vegetation, cultural resources, soils, and water. Due to improved construction techniques and the relatively small site footprint, we do not anticipate any long-term resource damage. In addition, all sites will receive rehabilitation upon completion of the construction phase.

***Comment #2.** Antoinette Beiser 4/16/01: The visual impact of the proposed towers is too great and preserving the views is more important than continuous wireless coverage.*

Response: The President and Congress have established that wireless communications are important to the nation. They have directed federal agencies to facilitate implementation of a wireless communications system through passage of the Telecommunications Act. A qualified landscape architect conducted a detailed visual assessment in attempts to locate tower sites that reduce visual impacts (see Project Record Document #462). The proposal was modified several times, including re-locating tower placement on the landscape, as a result of the visual assessment to accommodate visual concerns and issues. In addition, the I-17 Corridor Wireless Communications System was designed for co-location of multiple carriers at each electronic site. Locating many carriers at the same site reduces the number of towers and also reduces the total magnitude of the environmental effects.

***Comment #3.** Kevin Howell 4/17/01: Supports the proposal.*

Response: We thank you for your interest in the National Forests.

Comment #4. William Cowan 4/23/01: Summary of comment: Towers should be located on private lands or adjacent to existing development, not in remote areas away from the highway. Towers should be shorter and disguised.

Response: Attempts were made to locate technically acceptable sites on private land however there is very little private land along this part of I-17. The system does use private land sites near Kachina Village, at Orme Road, and at Camp Verde. Forest Service lands are being used only if private land sites are not available or if, in consultation with local planning authorities, it was determined that Forest Service sites had a lesser environmental impact. All of the proposed sites are within the corridor affected by the presence of I-17. Previously developed sites were used wherever possible like the Willard Springs Transfer Station, ADOT maintenance facility at Schnebly Hill Road, and the McGuireville Rest Stop. In addition, all of the proposed sites have existing access with the exception of Onion Mountain. None of these towers are in remote locations.

Please refer to page 6 of the EA for a description of an alternative considered but not analyzed in detail. One alternative called for shorter towers. Please note the significant increase in the number of towers to 26. During the visual assessment specific tower locations were modified in order to reduce the visual appearance of the towers. Tower height, topography, and vegetation were all considered when locating the towers. Each of these factors aided in minimizing the visual dominance of the towers.

Comment #5. Hopi Tribe 4/25/01: Supports the consolidated wireless proposal.

Response: We thank you for your interest in the National Forests.

Comment #6. James Devine, U. S.G. S. 5/07/01: Suggests redesign of towers to minimize bird nesting and roosting.

Response: We conducted a literature search and found that bird mortality at communication towers results from collision. Specific design requirements to reduce avian mortality from collision are required. Our review did not indicate that the proposed towers would be attractive to birds for nesting or roosting nor will the towers pose an electrocution risk.

Comment #7. Jim West, Wireless Industry Spokesperson 5/08/01: (1) The recommended mitigation measure for underground utilities for the Onion Mountain, Rocky Park, and Woods Canyon sites is environmentally unsound and economically unrealistic; (2) The recommended mitigation of requiring wire-line telephone connections instead of micro-wave dishes for the Rarick Canyon Site is unnecessary and will not significantly improve the visual quality of the facility and it may be technically unfeasible; (3) The mitigation of timing restrictions for access into the Rattlesnake Quiet Area for construction access to the Rocky park site would create a hardship for Industry and customers because it will delay construction.

Response: (1)(a) Onion Mountain site: Prescott National Forest Policy has required underground utilities for all 12KV lines and under for the past 20 years. We consider overhead utilities for this site. However, the risk of wildfire is a potential disruption of power to the site. Additionally, future natural resource management for Onion Mountain will most likely include prescribed burning. Overhead utilities would complicate prescribed burning.

(1b) Rocky Park – Underground utilities will be required only where there are visual concerns where the corridor crosses I-17. The Forest Service landscape architect will identify on the ground the beginning and end points of the underground utilities for inclusion in the prospectus.

(1c) Woods Canyon - Underground utilities will be required only where there are visual concerns where the corridor crosses I-17. The Forest Service landscape architect will identify on the ground the beginning and end points of the underground utilities for inclusion in the prospectus.

(2) After reviewing the Sunset Point Rest Area, which uses light poles with small microwave dishes, it is apparent that they are visually acceptable as long as they are small in diameter and painted a flat dark neutral color. Microwave dishes may be used for telephone connection at Rarick Canyon if they do not exceed three feet in diameter and are painted a flat dark neutral color. Microwave verses wire line connections will be evaluated through the prospectus and may be a factor for award of the lease.

(3) The Rattlesnake Quiet Area was established and designated in the Forest Land Management Plan (1987) to provide non-motorized recreational opportunities. Construction activities during the closure would conflict with Forest Service management objectives. In addition the area is important fall and winter turkey habitat. Construction activity during this period would adversely impact turkey survival over the winter. Therefore, the recommended mitigation is valid and will be required as part of the lease.

Comment #8. Dennis Barker, ADOT, 05/09/01: (1) ADOT is in favor of developing wireless communications systems for transportation corridors; (2) ADOT supports using 4 light poles for antennae support structures instead of the single 185 foot lattice tower.

Response: (1) Potential use of ADOT easement for I-17 was analyzed as part of the EA process. Several alternatives using light poles and short towers within ADOT's easement for I-17 were analyzed and dropped from further consideration. These alternatives were dropped because in order to meet the technical needs of the carriers too many towers and their associated access roads (because I-17 is a controlled access highway) would have to be constructed increasing environmental effects and making it cost prohibitive. (See EA Chapter 2)

(2) The Forest Service also supports using light poles at the McGuireville Rest Stop (Rarick Canyon) instead of the single 185-foot tall lattice tower. Because The Forest Service will coordinate with ADOT in the development of this site to ensure that ADOT objectives for the

rest area are considered.

Comment #9. *Larry Hughes, Crown Castle International, 05/11/01: (1) Do not designate the Onion Mountain site because Crown Castle has an available private land site that will serve the same area; (2) Designate the Rarick Canyon Site (McGuireville Rest Stop) but remove it from the prospectus and award the lease to Crown because they have an existing agreement with ADOT for tower construction on ADOT fee land adjacent to the rest stop; (3) Urges consideration of appropriate disturbed sites which may include ADOT right-of-ways located on Forest lands.*

Response: (1) According to the coalition of wireless service providers, the site Crown is proposing on private land will not meet the technical needs of all carriers. If this site is developed, a second site will also have to be developed to provide the same coverage that the Onion Mountain site provides. Detailed analysis of alternatives during the proposal development and environmental analysis processes, which include the private land site Crown is proposing, concluded that the Onion Mountain site is superior because it provides adequate coverage with a single tower in a visually acceptable setting.

(2) The proposed action will designate the McGuireville Rest Stop (Rarick Canyon) as a communication site to provide wireless service. The rest stop is within the ADOT easement for I-17, however it is still Forest Service land. Crown has no exclusive rights to develop Forest Service land for wireless communications; however, they do have exclusive development rights on the ADOT fee title land at the rest area. The Rarick Canyon communication site lease will be awarded through competitive bidding.

(3) Potential use of ADOT easement for I-17 was analyzed as part of the EA process. Several alternatives using light poles and short towers within ADOT's easement for I-17 were analyzed and dropped from further consideration. These alternatives were dropped because in order to meet the technical needs of the carriers. There would have been too many towers constructed increasing environmental effects and making it cost prohibitive. (See EA Chapter 2)

Comment #10. *Arizona Game and Fish Department, 05/31/01; (1) Towers should be constructed and installed to insure protection of raptors and other birds from electrocution should they perch on towers or incoming lines; (2) The road to Driveway Tank should not be blocked by a gate, and the gate for the tower access road needs to be carefully located to be effective; (3) the Department concurs with recommended mitigation for the Rocky Park and Woods Canyon sites, however they would like a construction timing restriction for Woods to not coincide with the Woods Canyon Big Game Winter Habitat Closure. In addition, the Department would like Industry access to the site during the closure periods be limited to emergency repairs and non-routine maintenance. Other activities should be scheduled outside of the closure period; (4) a gate should be installed on the access road to James Canyon Site to restrict access to authorized personnel.*

Response: (1) There will be no exposed high voltage points on the tower itself. The Tower will contain only antennae and microwave dishes. The specific overhead power-line design will not be known until an application is selected through the prospectus process. However, the Coconino LMP requires power lines and towers be built to specifications compatible with raptor use. The Forest Service will ask for Department participation in identifying specific avian mitigation for the electric power line at that time.

(2) The road to Driveway Tank will not be blocked by a gate. The gate will be installed on the access road for the tower. The specific location for the gate is not known at this time. It will be determined during final road design and will take in to account factors that will make it effective.

(3) The construction timing restriction for Rocky Park will be stipulated in the lease. Entry to the Rocky site during the seasonal closure will be limited to activities that are necessary to keep the system up and running. If an activity can be postponed until the closure is no longer in effect then it needs to be postponed. The Woods Canyon site is on the boundary of the seasonal closure and no limitation on access to the site for maintenance is needed.

(4) The Forest Service feels that a construction timing restriction for Woods Canyon is not necessary because of the proximity of the site to I-17. The area is already impacted by noise and activity from the highway.

(5) The lease for the James Canyon site will stipulate a gate. The specific location will be determined during final design.

Comment #11. *National Park Service, 06/01/01, Intermountain Region* No comments at this time, appreciate the opportunity to comment.

Response: We thank you for your interest in the National Forests.